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## EX PARTE

October 16, 1997

Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street N.W., Room 222  
Washington, D.C. 20554

Re: CC Docket No. 96-98, NPA Overlay

Dear Mr. Caton:

To follow up on our June 12, 1997 ex parte communication, attached is a copy of the correspondence BellSouth Telecommunications, Inc., in its capacity as Central Office Code Administrator and Numbering Plan Area ("NPA") Code Relief Coordinator, is sending to the industry regarding the upcoming 678 NPA all-services overlay in Atlanta. The letter specifically addresses the application procedure for the remaining NXX codes in the 770 area code. Pursuant to an order by the Georgia Public Service Commission, mandatory ten (10) digit dialing is scheduled to begin on January 1, 1998. NXX codes in the new 678 overlay NPA will become effective no sooner than January 6, 1998.

In light of its experience in implementing the 678 overlay code, BellSouth renews its request that the Commission grant its long-pending Petition for Reconsideration eliminating the unnecessary and counterproductive requirement of the *Second Interconnection Order* codified at 47 C.F.R. § 52.19(c)(3)(iii), and that it do so quickly.

Current Central Office Code Assignment Guidelines already allow affected industry participants, under the supervision of state commissions with delegated jurisdiction over NPA relief from the FCC, to reach consensus on the best way to allocate scarce numbering resources among competing applicants in an area code exhaust. All of these efforts are, of course, subject to the non-discrimination requirements established by the FCC in its numbering orders.

Absent the complete elimination of this requirement, we again urge the Commission to clarify and confirm that the requirement applies only to authorized facilities-based carriers that have not already been assigned an NXX in the existing area code. Such clarification would further the policies articulated in the *Second Interconnection Order*,

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would be consistent with current industry approved NXX code assignment guidelines and with the December 20, 1996 ruling of the California Public Utilities Commission, Decision 96-12-086, and would mitigate unwarranted and premature stockpiling of NXX codes.

If you have any questions concerning this submission, please contact the undersigned.

Sincerely,

A handwritten signature in cursive script, appearing to read "Cynthia Cox".

cc: Renee Alexander, Esq.  
Greg Cooke, Esq.  
Erin Duffy, Esq.  
Anna Gomez, Esq.

R. Stan Washer  
NPA Code Administration

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October 15, 1997

To Whom It May Concern:

The following is a concise description of the application procedure for the remaining central office (NXX) codes in Georgia's 770 area code.

- In its May 28, 1997 conference call, Industry participants agreed to reserve fifty (50) NXX codes in the exhausting 770 area code for distribution during the 90 day period prior to the introduction of the new overlay area code.
- The following telecommunications carriers may request assignment of one of the reserved 770 NXX codes (hereinafter "Qualified Carriers"):
  - (a) Any facilities-based telecommunications carrier, including CMRS providers, authorized to provide telephone exchange service, exchange access, or paging service in the 770 area code as of midnight on October 8, 1997;
  - (b) All current code holders in the 770 area code as of midnight on October 8, 1997.
- Requests by Qualified Carriers for assignment of an NXX code will be received by the NXX Code Administrator beginning Monday, October 20, 1997. Requests should be submitted via facsimile on a Central Office Code Assignment Request Form to Diane Schott, Georgia NXX Code Administrator at 404-524-2918. Requests are due to the NXX Code Administrator by the close of business on Monday, November 3, 1997. The number of qualified recipients for the reserved codes will be determined after receipt of all requests on November 3, 1997.

Any questions about the above procedures should be directed to the NPA Code Administrator, Stan Washer, at 205-977-2668.

*Stan Washer*